Remarks/Arguments

The present application now contains claims 15-29 and 32-34. Applicant has amended claim 26 and canceled claim 27 to better point out and claim their invention. Applicant requests reconsideration of the rejection in view of the remarks presented below.

Before proceeding to address the Examiner's rejections, Applicant will briefly summarize his invention to assist the Examiner in better appreciating the differences between Applicant's invention and the art of record. As recited in claim 15, Applicant provides an apparatus for correcting color video signals that include a matrix for processing color video signals to control the proportions of three primary colors in color value signals. The matrix comprises nine multipliers and three adders, wherein three of the nine multipliers are connected to one adder, respectively. A first controller controls the matrix as a function of the hue of the color video signals. A second controller controls the matrix as a function of color saturation. The combination of the matrix and the two controllers affords precise color control which is particularly important in connection with the scanning of film.

Objection to Claim 27

Applicant has amended claim 26 to delete the word, "further", and has canceled claim 27. Therefore, with the cancelation of claim 27, the objection to that claim becomes moot.

35 U.S.C. 102(b) Rejection of Claims 15-29 and 33-35

Claims 15-29 and 33-35 now stand rejected under 35 U.S.C. 102(e), as anticipated by US Patent 6,337,692, issued in the name of Sanjay D. Rai et al., on January 8, 2002, from an application filed March 31, 1999. With regard to Applicants' claim 15, the Examiner contends that the '692 patent to Rai et al. teaches Applicant's matrix comprised of nine multipliers and three adders. Applicant disagrees.

The color correction system of Rai et al. includes Alpha Mixer 1230, as depicted in FIG 12, that functions to adjust the input color values (R_{in}, G_{in}, and B_{in}) to yield the output color values (R_{out}, G_{out} and B_{out}), as described at Col. 30, lines 32-45 of the '692 patent. Thus, to the extent that the Rai et al. color correction system has any element performs the equivalent function to Applicants' matrix, it is the Alpha Mixer 1230. However, as discussed at Col. 30, lines 45-60, the color mixer circuit comprises two multipliers and an adder, or one multiplier and two subtractors, as depicted in FIG. 13A. Indeed, Rai et al. make clear that

minimizing the number of multipliers is preferable, thus teaching away from the use of Applicant's nine-multiplier, three adder matrix.

The Examiner's reliance on the nine-multiplier, three adder circuit of FIG. 13B in the '692 patent to Rai et al. as constituting the equivalence of Applicant's matrix is misplaced. As discussed at Col. 30, lines 61-65, of the '692 patent, the nine-multiplier, three adder circuit of FIG. 13B comprises part of the T-Matrix Multiplier array 1234 which functions to generate the color correction coefficients used by the Alpha mixer 1230. Given that the T-Matrix Multiplier array 1234 of Rai et al. does not constitute the equivalent of Applicant's matrix, the Examiner cannot rely on the Rai et al. patent to teach all of the features of Applicant's claim 15. Therefore. claim 15, and claims 16-26, 28-29 and 33-34, which depend therefrom, patentably distinguish over the '692 patent to Rai et al. Applicant requests withdrawal of the 35 U.S.C. 102(e) Rejection of these claims.

35 U.S.C. 103(a) Rejection of Claim 32

Claim 32 stands rejected under 35 U.S.C. 103(a) as obvious over the '692 patent to Rai et al. in view of US patent 6,433,898 in the name of Gunter Bestmann. In rejecting claim 32, the Examiner contends that the '692 patent to Rai et al. teaches all of the features of claim 32 but fails to teach the use of logarithmizers connected upstream of the matrix and delogarithmizers connected downstream of the matrix. The Examiner relies on the Bestmann patent for that teaching

Claim 32 ultimately depends from claim 15 and incorporates by reference all of the features thereof. As discussed above with respect to the 35 U.S.C. 102(e) rejection of claim 15, the '692 patent to Rai et al. does not teach Applicant's matrix which comprises nine multipliers and three adders. The Bestmann patent likewise does not show a matrix comprised of nine multipliers and three adders. Therefore, the combination of the Rai et al., and Bestmann would not teach all of the features of claim 15, or all of the features of claim 32 that depends therefrom. Therefore, claim 32 patentably distinguishes over the art of record, and Applicant requests withdrawal of the 35 U.S.C. 103(a) rejection of that claim.

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Conclusion

In view of the foregoing amendments to the claims and the accompany remarks, Applicant solicits entry of this amendment and allowance of the claims. If, however, the Examiner believes such action cannot be taken, the Examiner is invited to contact the Applicant's attorney at (609) 734-6820, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Please charge the $490 fee for the 2 Month Extension, and any other charges that may be due in connection with the application, to Deposit Account No. **07-0832.**

Respectfully submitted,

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